

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA §
§
V. § CRIMINAL NO. 4:24-CR-448
§
§
KELSEY QUINN RIGBY §

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE

TO UNITED STATES DISTRICT ANDREW S. HANEN:

Kelsey Quinn Rigby files Defendant's Unopposed Motion For Continuance and would show as follows:

I.

Pretrial motions must be filed by March 7, 2025. The trial is scheduled to begin on April 7, 2025.

II.

This is a complex case involving six defendants. The Government has not provided all of the discovery but expects to do so by the end of March. The case will be ripe for resolution at that time.

III.

Counsel must obtain complete discovery in order to file the appropriate pretrial motions and discuss with Rigby whether she should enter into a plea agreement or go to trial. Accordingly, she requests a continuance.

Respectfully submitted,

/s/ Randy Schaffer

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Attorney for Defendant

KELSEY QUINN RIGBY

CERTIFICATE OF CONFERENCE

AUSA Anh-Khoa Tran informed me on March 6, 2025, that the Government does not oppose a continuance.

/s/ Randy Schaffer

Randy Schaffer

CERTIFICATE OF SERVICE

I served a copy of this document on AUSA Anh-Khoa Tran, 1000 Louisiana, Suite 2300, Houston, Texas 77002, by eFile and email on March 7, 2025.

/s/ Randy Schaffer

Randy Schaffer